

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY,
SYLVIA DAY, JONATHAN FRANZEN,
JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS, SCOTT
TUROW, and RACHEL VAIL, individually and
on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC, OPENAI
GP LLC, OPENAI LLC, OPENAI GLOBAL
LLC, OAI CORPORATION LLC, OPENAI
HOLDINGS LLC, OPENAI STARTUP FUND
I LP, OPENAI STARTUP FUND GP I
LLC, OPENAI STARTUP FUND
MANAGEMENT LLC, and MICROSOFT
CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR
BRANCH, RICH COHEN, EUGENE LINDEN,
DANIEL OKRENT, JULIAN SANCTON,
HAMPTON SIDES, STACY SCHIFF, JAMES
SHAPIRO, JIA TOLENTINO, and SIMON
WINCHESTER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION,

Defendants.

Case No. 1:23-cv-08292-SHS;
Case No. 1:23-cv-10211-SHS

**DECLARATION OF MAYA LANG
IN SUPPORT OF MOTION FOR
VOLUNTARY DISMISSAL**

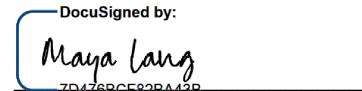
DECLARATION OF MAYA LANG

I, Maya Lang, declare under penalty of perjury pursuant to 18 U.S.C. § 1746, as follows:

1. I am the author of two published books—*What We Carry: A Memoir* and *The Sixteenth of June: A Novel*.
2. I have been a plaintiff in the above-captioned case, *Authors Guild, et al. v. OpenAI, Inc., et al.* since it was initiated on September 19, 2023.
3. In May of 2024, I made the difficult determination that I needed to withdraw from this litigation. I communicated my need to withdraw to my attorneys immediately.
4. Due primarily to my mother's worsening dementia and my caretaking obligations, and also to some personal issues involving my family (where I am a single parent), I regrettably no longer feel able to serve as a plaintiff and class representative in this lawsuit on behalf of authors against OpenAI and Microsoft.
5. My reasons for withdrawing from this case (and decision to step down from my volunteer role as President of the Authors Guild) do not pertain in any way to the claims in the lawsuit.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 19th day of August, 2024 in Sleepy Hollow, New York.

—DocuSigned by:

Maya Lang
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PROOF OF SERVICE VIA ECF

On August 19, 2024, I caused to be served the following document on all counsel of record via ECF:

**DECLARATION OF MAYA LANG IN SUPPORT OF MOTION FOR
VOLUNTARY DISMISSAL**

/s/ Wesley J. Dozier
Wesley Dozier